Regarding: RM-11306

Summary

I fully support the adoption of RM-11306 **with the addition of a narrow-band segment established for the 160 meter band which compliments the world-wide band-plans in International Amateur Radio Union (IARU) Regions 1, 2, 3**.

Discussion

Specifying the type of emission which may be transmitted by the control operator of a station in the Amateur Radio Service in terms of bandwidth limitations within a specified segment of an amateur band is consistent with amateur experimentation and utilization of emerging wireless technologies and facilitates quickening the pace of technology transformation from the experimental to useful and operational modes.

The proposed maximum bandwidth (3.5 kHz) in RM-11306 as it pertains to the 160M amateur band does NOT compliment the band-plans agreed upon and being implemented in the three IARU Regions of the world, nor does it support the band-plan established by the American Radio Relay League (ARRL) for the 160M band. The band-plans established by the IARU members, of which the USA is a member, have been coordinated in order to maximize compatibility of communications world-wide while minimizing the potential for conflicting modes and interference.

As can be seen in Table-1, all three IARU regions provide for a narrow bandwidth segment in the 1800 – 2000 kHz frequency band, either specified by a frequency bandwidth or a mode commonly associated as being a narrow bandwidth mode. Typically this narrow bandwidth segment is in the lower 40 kHz of the 160M band, extending from 1800 ≈ 1840 kHz.

The 3.5 kHz bandwidth specified in RM-11306 over the entire 160M band is objectionable from the perspective of: (1) conflicts with the world-wide agreement among the IARU member countries that a narrow band segment be allocated in Region 2 as it is in Regions 1 & 3; and (2) from an interference perspective due to incompatibility of various modes of existing and emerging wireless technologies and the desire for amateurs world-wide to collaborate in their development of new wireless technologies, modes of operation and operational capabilities through testing on the 160M band.

Conclusion

The FCC should implement the proposed changes to 47 C.F.R. §97 regulations as proposed by RM-11306 ***with the following change***:

Establish a narrow bandwidth segment on the 160M band consistent with and compatible with the narrow bandwidth segments established in IARU Regions 1, 2, & 3.

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Spectrum Utilization Plans[1]	Frequency Segment (kHz)	Maximum Bandwidth[2]	Remarks
IARU Region 1 Band Plan	1800 – 1838 1838 – 1840 1840 - 1842 1842 - 2000	200 Hz 500 Hz 2.7 kHz 2.7 kHz	CW Digimode except packet[3], CW Digimode except packet, phone[4], CW Phone, CW
IARU Region 2 Band Plan	1800 – 1840 1840 - 2000	CW, digimode Phone, CW	Band plan specifies mode rather than maximum bandwidth.
IARU Region 3 Band Plan	1800 – 1840 1840 - 2000	CW, RTTY Phone, CW	Band plan specifies mode rather than maximum bandwidth.
ARRL Band Plan	1800 – 1810 1800 – 1843 1843 - 2000	Digimodes CW CW, SSB, SSTV, other wide-band modes	Band plan specifies mode rather than maximum bandwidth.
RM-11306 (ARRL)	1800 - 2000	3.5 kHz	

Table-1

[1] IARU band plans may be viewed at: http://www.iaru-r1.org. The ARRL band plans are available at: http://www.arrl.org/FandES/field/regulations/bandplan.html.
[2] Maximum bandwidth in IARU band plans is currently specified as a frequency (in Hz or kHz) in Region 1 only.
[3] Packet radio is not allowed on the 1.8, 7, and 10 MHz bands in Region 1.
[4] Band plan states: "*Those societies which have SSB allocation below 1840 kHz may continue to use it, but they are requested to take all necessary steps with their license administrations to adjust the phone allocations in accordance with the Region 1 Bandplan*".